

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAVONNA JAMES, individually and on behalf
of all others similarly situated,

Plaintiff,

Case No.: 1:21-cv-06544

-against-

COHNREZNICK LLP,

Defendant.

PLAINTIFF’S UNOPPOSED
MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT

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Plaintiff Davonna James (“Plaintiff”) hereby moves this Court for final approval of the class action settlement preliminarily approved by this Court on May 3, 2022. Plaintiff respectfully requests that this Court:

- a. Grant final certification of the Settlement Class, appoint Plaintiff Davonna James as Class Representative, and appoint of David K. Lietz of Milberg Coleman Bryson Phillips Grossman, and M. Anderson Berry of Clayco C. Arnold, a Professional Law Corp.; as Class Counsel;
- b. Approve the requested combined attorneys’ fees and expenses in the amount of \$125,000, and Plaintiff’s requested service award in the amount of \$1,500;
- c. Find that the Notice met the requirements of due process and Federal Rule of Civil Procedure 23;
- d. Find that the terms of the Settlement Agreement fair, reasonable, and adequate and approved, adopted, and incorporated by the Court;

e. Direct the Parties, their respective attorneys, and the Claims Administrator to consummate the Settlement in accordance with the Court Order and the terms of the Settlement Agreement, and;

f. Resolve all claims against all parties in this Action and issue the Proposed Final Approval Order.

This Motion is based on the Supporting Memorandum filed herewith; the Settlement Administrator Declaration of Postlethwaite and Netterville APAC (“P&N”) in Support of Final Approval filed herewith; the Declaration of David K. Lietz in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement filed herewith; the Settlement Agreement entered into between the parties as well as the Notices issued to the Class at ECF 33-1; Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, Supporting Memorandum, Supporting Declarations, and Firm Resumes at ECF 33, 33-2, and 33-3; and Plaintiff’s Motion for Approval of Attorneys’ Fees, Expenses, and Service Awards and accompanying documents at ECF 49, 50, 50-1, and 50-2, and; all other pleadings and papers on file in this action; and any oral argument that may be heard by this Court at or prior to the Final Approval Hearing currently scheduled for September 7, 2022.

Defendants do not oppose the relief sought in this motion.

Wherefore, premises considered, Plaintiffs requests that this Court grant this motion.and grant the motion for attorneys’ fees, costs, and service awards (ECF No. 49).

Dated: August 8, 2022

Respectfully submitted,

/s/ David Lietz

David K. Lietz

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